

May 26, 2019

## VIA ECF

The Honorable Alison J. Nathan United States District Court Southern District of New York 40 Foley Square New York, NY 10007 USDO SINY DAKUMANY DAKUPINYO ANALEMBED DAKUPINYO MAY 2 8 2019

Oral argument is adjourned to June 3, 2019 at 2:00 p.m. SO ORDERED.

SO CRDERED:

HON ALISON S NATHAN UNITED STATES DISTRICT JUDGE

Re: Letter Motion for Continuance of Forthcoming Hearing

Natural Resources Defense Council, et al. v. Zinke, et al., 18-cv-6903 (AJN)

## Dear Judge Nathan:

I am counsel for Plaintiffs in the above-referenced matter, which challenges the Department of the Interior's creation and maintenance of the International Wildlife Conservation Council. On May 23, 2019, the Court scheduled oral argument on Defendants' Motion to Dismiss for May 30, 2019. Plaintiffs respectfully request that the Court continue that hearing until at least June 3, 2019 due to the theft of counsel's personal belongings.

On May 25, 2019, the undersigned departed from Washington, D.C. to Zion National Park, via Las Vegas, Nevada. There, thieves forced entry into counsel's rental car and removed all of counsel's belongings and those of his travel companions, including counsel's laptop and other materials necessary to prepare for the May 30 hearing.

The undersigned, who had planned to appear at the argument, will not return to Washington, D.C. until the evening of May 28, 2019, and cannot access case-related material until that time. Plaintiffs' other counsel of record is out of the country and will not return until the week of June 10, 2019.

Accordingly, Plaintiffs respectfully request that the Court continue the May 30, 2019 hearing on Defendants' motion to dismiss until a date after June 2, 2019 that is available to the Court and the parties. (The undersigned further notes that he would be unavailable June 7, 2019 and June 11, 2019, due to additional, previously-planned travel.)

On May 25, 2019, counsel for Plaintiffs contacted counsel for Defendants regarding this motion; Defendants have not yet responded to Plaintiffs' communications.

Plaintiffs regret any inconvenience to the Court and counsel for Defendants.

Respectfully submitted,

/s/ Travis J. Annatoyn

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